

IN THE UNITED STATES DISTRICT COURT
FOR
THE WESTERN DISTRICT OF PENNSYLVANIA

DOHERTY KUSHIMO

PETITIONER

v.

UNITED STATES OF AMERICA

RESPONDENT

FILED

MAR 10 2020

CLERK U.S. DISTRICT COURT
WEST. DIST. OF PENNSYLVANIA

1:14-cr-12

MOTION TO AMEND JUDGEMENT OF CONVICTION

Now comes, Doherty Kushimo, "the Petitioner" in the above captioned matter asking that this court amends it's judgement and recommend that the Bureau of Prisons, "BOP" enroll him in the Residential Drug and Alcohol Abuse Program, "RDAP".

The District court entered MR. Kushimo's judgement on September 21, 2018. The court did not make a recommendation to the BOP that Mr, Kushimo needed treatment for his abuse of alcohol, because his counsel failed to address the issue with the court.

Mr. Kushimo's Pre-Sentence Report, ¶71 thru 76, supports his request for amending the judgement, it even went so far to address

copy of this motion by First Class Mail, United States Postal Service to the clerk of courts for filing and the government will be notified electronically.

Respectfully Submitted,



Doherty Kushimo

Federal Medical Center, Devens MA,

PO Box 879

Ayer MA, 01432

March 3, 2020

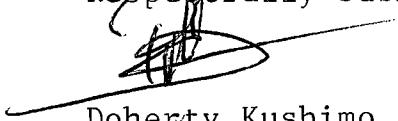
the fact that Mr. Kushimo was arrested for Drunk Driving in 1990.

Conclusively, ¶ 76 states "given the defendant has abused alcohol on more than one occasion, this area of the defendant's life should be explored further. It does not appear that the defendant has ever participated in alcohol counseling". It is with these known facts that Mr. Kushimo is asking that the court recommend that he participates in the RDAP program.

RELIEF REQUESTED

Mr. Kushimo, respectfully request that the court enter's an order, directing the BOP to consider him for enrollment into RDAP.

Respectfully Submitted,


Doherty Kushimo

Federal Medical Center, Devins MA

PO Box 879

Ayer MA, 01432

March 3, 2020

CERTIFICATE OF SERVICE

I Doherty Kushimo, certify that on March 3, 2020 I mailed a